

FARER FERSKO, a Professional Association
600 South Avenue
P.O. Box 580
Westfield, NJ 07091-0580
(908) 789-8550
Attorneys for Plaintiffs
Association of New Jersey Rifle and
Pistol Clubs, Inc., Scott L. Bach,
Kaare A. Johnson, Vincent Furio, Steven Yagiello
and Bob's Little Sport Shop, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

ASSOCIATION OF NEW JERSEY RIFLE
AND PISTOL CLUBS, INC., a New
Jersey Not for Profit
Corporation; SCOTT L. BACH; KAARE
A. JOHNSON; VINCENT FURIO; STEVEN
YAGIELLO and BOB'S LITTLE SPORT
SHOP, INC., a New Jersey
Corporation,

Plaintiffs,

v.

CHRISTOPHER J. CHRISTIE, Governor
of the State of New Jersey; PAULA
T. DOW, Attorney General of the
State of New Jersey; COLONEL RICK
FUENTES, Superintendent, Division
of New Jersey State Police;
WASHINGTON TOWNSHIP (Morris
County); CITY OF HACKENSACK;
LITTLE EGG HARBOR TOWNSHIP and
XYZ MUNICIPALITIES 1-563;

Defendants.

Civil Action No.:
10-cv-00271-JAP-TJB

**STIPULATION OF SETTLEMENT AMONG
PLAINTIFFS AND DEFENDANT
WASHINGTON TOWNSHIP**

STIPULATION OF SETTLEMENT

This Stipulation of Settlement ("Stipulation") is entered into among (i) Plaintiffs, Association of Rifle and Pistol Clubs, Inc., Scott L. Bach, Kaare A. Johnson, Vincent Furio, Steven Yagiello and Bob's Little Sports Shop, Inc. (collectively, the "Plaintiffs"), and (ii) Defendant, Washington Township ("Washington"), by and through their undersigned attorneys.

WHEREAS, on January 7, 2010, Plaintiff Kaare A. Johnson ("Johnson") applied to the Washington Township Police Department for multiple Permits to Purchase a Handgun ("Permits"); and

WHEREAS, on January 8, 2010, Johnson received a letter from the office of the Chief of Police of Washington Township, refusing to issue to Johnson more than one Permit per month; and

WHEREAS, on January 17, 2010, Plaintiffs commenced this action against Washington, alleging a violation of N.J.A.C. 13:54-1.4(h); and

WHEREAS, subsequent to the filing of the Complaint in this matter, Washington sent Johnson a second letter, dated January 25, 2010, attached hereto as Exhibit A, in which Washington indicated that it would allow applicants to apply for and receive more than one Permit at one time.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the Plaintiffs and Washington, by and through their duly authorized counsel:

1. The claims raised in the above-captioned matter against Washington are dismissed without prejudice and without costs or fees to any party, based upon the terms and conditions set forth in this Stipulation;

2. Defendant Washington Township shall pay to Plaintiffs the total sum of one thousand dollars (\$1,000) within ten (10) days of signing this Stipulation;

3. All parties to this Stipulation have been represented by counsel and have agreed to the execution of this document after being advised by counsel. The persons signing this Stipulation have authority to bind their respective clients; and

4. Signatures to this Stipulation may be made via facsimile and in counterparts.

[SIGNATURE PAGE FOLLOWS]

We hereby agree to this Stipulation and the terms contained herein:

**ASSOCIATION OF NEW JERSEY RIFLE AND PISTOL CLUBS, INC., SCOTT L. BACH, KAARE A. JOHNSON, VINCENT FURIO, STEVEN YAGIELLO and BOB'S LITTLE SPORT SHOP, INC.,
PLAINTIFFS**

By:

Dated:

/s/ Daniel L. Schmutter April 7, 2010
Daniel L. Schmutter, Esq.
Farer Fersko, a Professional Association
600 South Avenue
P.O. Box 580
Westfield, NJ 07091-0580
(908) 789-8550
Attorneys for Plaintiffs

**WASHINGTON TOWNSHIP,
DEFENDANT**

By:

Dated:

/s. John P. Jansen April 2, 2010
John P. Jansen, Esq.
Jansen & DeBona, LLC
413 West Main Street
Boonton, NJ 07005
(973) 334-0031
Attorneys for Defendant,
Washington Township

SO ORDERED:

HON. JOEL PISANO, U.S.D.J.